

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:

NATIONAL FORGE COMPANY, et al.,

Debtor.

OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF NATIONAL FORGE
COMPANY,

Civil No. 04-21 Erie

Related to Document No. 41

Plaintiff,

Document No. _____

and

OFFICIAL COMMITTEE OF RETIREES
OF NATIONAL FORGE COMPANY,

Intervenors,

v.

E. ROGER CLARK, both Individually and as
an Officer and Director of National Forge
Company, et al.,

Defendants.

MOTION OF DEFENDANTS E. ROGER CLARK,
MAURICE J. CASHMAN, DANA BEYELER AND ROBERT A.
KAEMMERER FOR AN ORDER EXTENDING BRIEFING SCHEDULE DEADLINE

By this motion (the “Motion”), E. Roger Clark, Maurice J. Cashman, Dana Beyeler and Robert A. Kaemmerer (the “Defendants”), through their respective counsel, request additional time to reply to the Plaintiff’s opposition to the Defendants’ Motion for Summary Judgment as to Counts I Through VII of the Amended Complaint [Document No. 46] (the “Summary Judgment Motion”) and in support of this request state as follows:

1. By Order dated September 7, 2005, the Court, on the Defendants' motion, permitted the Defendants to withdraw their motion for summary judgment [Document No. 23] and the accompanying brief [Document No. 25] as well as the joinders filed by the remaining defendants to that motion and brief [Document Nos. 26 and 27, respectively].

2. In the same Order, the Court set the deadline for the Defendants to respond to the Plaintiff's Amended Complaint at September 26, 2005, on which date the Defendants filed the Summary Judgment Motion. The remaining defendants either filed their own summary judgment motion or joined in with the Summary Judgment Motion.

3. Plaintiff and Intervenors filed their response to the Summary Judgment Motion on October 18, 2005.

4. The deadline to file replies is October 31, 2005.

5. Due to an unexpected matter, Defendants' counsel has had to divert time away from working on a reply in this case.

6. Defendants request that they be permitted an additional four days, until Friday, November 4, 2005, to file their reply to the Plaintiff's opposition to the Summary Judgment Motion. Plaintiff's counsel has consented to this extension.

WHEREFORE, the Defendants request that the relief sought above be granted. A proposed Order is attached for the Court's consideration.

Dated: October 28, 2005

Respectfully submitted,

/s/ Erik Sobkiewicz _____
 Erik Sobkiewicz
 CAMPBELL & LEVINE, LLC
 1700 Grant Bldg., Pittsburgh, PA 15219
 Telephone: (412) 261-0310
 Counsel for E. Roger Clark, Maurice J. Cashman,
 Dana Beyeler and Robert A. Kaemmerer

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E. ROGER CLARK, both Individually and as
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Certificate of Service

I hereby certify that on October 31, 2005, I caused a copy of the foregoing "Motion of
Defendants E. Roger Clark, Maurice J. Cashman, Dana Beyeler and Robert A. Kaemmerer for an
Order Extending Briefing Schedule Deadline" to be served on the following by first class mail,
postage prepaid:

David W. Lampl, Esquire
John M. Steiner, Esquire
LEECH TISHMAN FUSCALDO &
LAMPL, LLC
525 William Penn Place
Citizens Bank Building, 30th Floor
Pittsburgh, PA 15219

Dated: October 31, 2005

Respectfully submitted,

/s/ Erik Sobkiewicz

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